

EEOC charge 433-2023-03546 IBM age discrimination

SPD Ver
Jan 2020

HRA FUNDS:

Specific Plan Purchase required			Special Consideration: No purchase required			
Medicare Advantage from Viabenefits	Prescription Drug Plan from Viabenefits	Medicaid	Outside USA	Military (VA, Tricare)	Kaiser	TBD



X



X:

HRA eligible retiree population as segmented by IBM (6 segments + 1 TBD)

IBM discriminates as purchase requirement is financially and medically punitive

Plaintiff is part of this retiree segment

Specific Plan Purchase required		Special Consideration: No purchase required				
Medicare Advantage from UnitedHealthcare	Drug Plan from ViaB before + MedGap F/G	Medicaid (added 2023)	Outside USA	Military (VA, Tricare)	Kaiser	TBD



X



X:

HRA eligible retiree population as segmented by IBM (6 segments + 1 TBD)

IBM discriminates as purchase requirement is financially and medically punitive

SPD: Summary Plan Description

HRA: Health Reimbursement Account

SPD Ver
Jan 2023

HRA FUNDS:

Exhibit \$
One page
Overview